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For Defendants

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**

Nomad Capitalist, Limited, a Hong Kong  
Company,

Plaintiff,

v.

Nomad Elite, LLC, a Texas limited liability  
company, and Arno Gerald Summer, an  
individual,

Defendants.

Case No.: 1:24-cv-01481

**DEFENDANTS' NOTICE OF NON-  
OPPOSITION TO PLAINTIFF'S MOTION  
TO AMEND COMPLAINT**

**DEFENDANTS' NOTICE OF NON-OPPOSITION TO PLAINTIFF'S MOTION TO  
AMEND COMPLAINT**

Defendants Arno Gerald Summer (“Gerald Summer”) and Nomad Elite, LLC  
 (“Defendants”) hereby submit this Notice of Non-Opposition to Plaintiff’s Motion to Amend the  
 Complaint, filed on June 4, 2025 (D.E. No.: 26).

DATED: June 9, 2025

Respectfully Submitted,

By: /s/ Susanne Arani  
Susanne Arani, Esq.

Attorney for Defendants (PHV)

DATED: June 9, 2025

By: /s/ Peter J. Glazer  
Peter J. Glazer, Esq.

Attorney for Defendants

#### CERTIFICATION OF SERVICE BY ECF

I, Susanne Arani, hereby certify that the forgoing document, Defendants’ Notice of Non-  
 Opposition was served to all counsel of record on the ECF service list on June 9, 2025.

/s/ Susanne Arani  
Susanne Arani, Esq.